

ALB:MD/RMP  
F. #2020R00434

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

- against -

PATRICK WOLFE,

Defendant.

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I N D I C T M E N T

**1:21-cr-00408(WFK)(RER)**

Cr. No. \_\_\_\_\_  
(T. 21, U.S.C., §§ 841(a)(1),  
841(b)(1)(A)(ii)(II), 841(b)(1)(C), 846,  
853(a) and 853(p); T. 18, U.S.C.,  
§§ 1956(h), 2 and 3551 et seq.)

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Distribute and Possess with Intent to Distribute Cocaine)

1. In or about and between January 2015 and April 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant PATRICK WOLFE, together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1). The amount of cocaine involved in the conspiracy attributable to the defendant as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, was five kilograms or more of a substance containing cocaine.

(Title 21, United States Code, Sections 846 and 841(b)(1)(A)(ii)(II); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO  
(Money Laundering Conspiracy)

2. In or about and between January 2015 and April 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant PATRICK WOLFE, together with others, did knowingly and intentionally conspire to conduct one or more financial transactions in and affecting interstate and foreign commerce, to wit: the transfer of money by check, which transactions in fact involved the proceeds of specified unlawful activity, to wit: cocaine distribution, in violation of Title 21, United States Code, Section 841(a)(1), knowing that the property involved in the transactions represented the proceeds of some form of unlawful activity, (a) with the intent to promote the carrying on of the specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(A)(i), and (b) knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(B).

(Title 18, United States Code, Sections 1956(h) and 3551 et seq.)

COUNT THREE  
(Possession of Cocaine with Intent to Distribute)

3. On or about February 6, 2020, within the Eastern District of New York, the defendant PATRICK WOLFE, together with others, did knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

4. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged herein, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offenses to forfeit: (a) any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of such offenses; and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:


- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

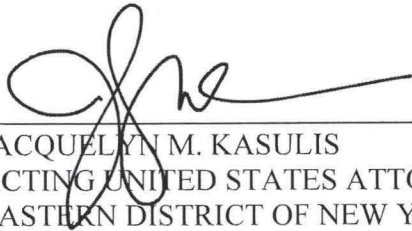
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

A TRUE BILL

  
A handwritten signature in black ink, appearing to read "Samuel H.", is written over a horizontal line.

FOREPERSON

  
A handwritten signature in black ink, appearing to read "J. Kasulis", is written over a horizontal line.

JACQUELYN M. KASULIS  
ACTING UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

F. #2020R00434  
FORM DBD-34  
JUN. 85

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

PATRICK WOLFE,

Defendant.

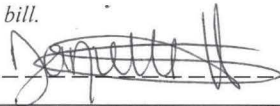
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**INDICTMENT**

(T. 21, U.S.C., §§ 841(a)(1), 841(b)(1)(A)(ii)(II), 841(b)(1)(C), 846,  
853(a) and 853(p); T. 18, U.S.C., §§ 2, 1956(h) and 3551 et seq.)

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*A true bill.*



\_\_\_\_\_  
*Foreperson*

Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

\_\_\_\_\_  
*Clerk*

Bail, \$ \_\_\_\_\_

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*Marietou Diouf and Robert M. Pollack,  
Assistant U.S. Attorneys, (718) 254-7000*